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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**PLAINTIFFS' NOTICE OF ERRATA RE:
AUGUST 1, 2025 HEARING**

Additional Counsel for Plaintiffs

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NOTICE OF ERRATA

Plaintiffs submit this Notice of Errata to correct an inadvertent misstatement by Plaintiffs' counsel during the August 1, 2025, hearing on Defendants' Motions to Dismiss and the Parties' Motions for Summary Judgment. During the hearing, undersigned counsel stated that Plaintiff National TPS Alliance has one full-time staff member and two part-time staff members. Counsel believed that information to be accurate at the time. However, counsel learned this week that all three of NTPSA's staff members are currently working full-time. Plaintiffs do not believe this alters the fact that limiting relief to NTPSA members would cause significant administrative burdens for NTPSA, as well as raising other serious concerns. As Plaintiffs' counsel stated during the August 1, 2025, hearing, should this Court consider it necessary to determine whether limiting relief in this case to named Plaintiffs would provide complete relief to members of the NTPSA, Plaintiffs respectfully request the opportunity to provide supplemental briefing on that question.

Date: August 7, 2025

Respectfully submitted,

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/s/ Jessica Karp Bansal
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

NATIONAL DAY LABORER ORGANIZING
NETWORK

/s/ Jessica Karp Bansal
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